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Order Instituting Rulemaking to Continue the Development of Rates and Infrastructure for Vehicle Electrification.	)	Rulemaking 18-12-006

OPENING COMMENTS OF THE JOINT COMMUNITY CHOICE AGGREGATORS ON SECTION 10 OF THE ENERGY DIVISION STAFF PROPOSAL FOR A TRANSPORTATION ELECTRIFICATION FRAMEWORK

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In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission" or "CPUC") and the *Email Ruling Resetting Procedural Schedule for Comments on Transportation Electrification Framework Sections,* dated August 4, 2020, the Joint Community Choice Aggregators ("Joint CCAs") submit these opening comments on Section 10 of the Draft Transportation Electrification Framework ("TEF").[1] The Joint CCAs have also reviewed and fully support the opening comments filed concurrently by Peninsula Clean Energy Authority ("PCE") on Sections 9, 10 and 12 of the Draft TEF.

I. INTRODUCTION AND SUMMARY

The Draft TEF recognizes the key role Community Choice Aggregators ("CCAs") play in fostering the adoption of transportation electrification ("TE") in California. At this point in time, CCAs are already the default Load Serving Entity ("LSE") for four million customer accounts in the state, serving over ten million Californians.[2] There are currently 21 operational CCAs in California, and CCAs supplied 44,400 GWh of electricity in 2019.[3] As noted in the Draft TEF, seven additional CCAs are expected to be operational by 2021.[4] Given this level of service by CCAs, the Draft TEF appropriately emphasizes the need for increased coordination between the

[1] The Joint CCAs consist of Marin Clean Energy ("MCE"), Sonoma Clean Power Authority ("SCP"), California Choice Energy Authority ("CalChoice"), Silicon Valley Clean Energy Authority ("SVCE"), East Bay Community Energy ("EBCE"), Redwood Coast Energy Authority ("RCEA"), the City of San José, and Clean Power Alliance of Southern California ("CPA"). The group of CCAs that comprises the Joint CCAs, as defined in this filing, is not identical to the group of CCAs that has filed under this designation in prior filings in this docket.

[2] *See* Draft TEF at 132.

[3] *See id. See also* https://cal-cca.org/cca-impact/.

[4] *See* Draft TEF at 132.

investor-owned utilities ("IOUs") and CCAs in the development and administration of TE programs. The Joint CCAs strongly agree that IOU-CCA coordination must be a fundamental part of TE program deployment.

The Joint CCAs appreciate the time and effort the Commission and its staff have expended on development of the Draft TEF. The Joint CCAs are encouraged that the Commission is exploring the appropriate role of CCAs in accelerating TE, including the possibility of CCAs serving as Program Administrators ("PAs") of TE programs and pilots using funds recovered through customer rates.[5] The Joint CCAs are committed to enabling widespread TE across all customer segments to reduce Greenhouse Gas ("GHG") emissions as well as criteria air pollutants, and have already developed CCA-funded programs in pursuit of this goal.[6] The Joint CCAs look forward to working collaboratively with the Commission, the IOUs, and other stakeholders to advance California's TE efforts, and to further explore ways by which CCAs may capitalize on their inherent advantages at a local and regional level to accelerate TE.

The following is a summary of the Joint CCAs' principal positions and recommendations with respect to Section 10 of the Draft TEF:

- California's TE goals require a multi-pronged approach that enlists both CCAs and IOUs in a manner that maximizes their respective strengths and advantages;
- Given their unique connection to the local communities they serve, and their role as the default LSE in those communities, CCAs are well positioned to design and administer TE programs across all customer segments;
- Other ratepayer-funded clean energy programs provide a reference for how the Commission may authorize CCAs to access customer funds and serve as PAs for TE programs;
- CCAs should be permitted to draft and file: (i) their own Transportation Electrification Plans ("TEPs"), (ii) applications for approval of their own TE programs; and (iii) advice letters for approval of TE pilots;
- With both CCAs and IOUs serving in the role of TE PAs, increased coordination and planning will be essential to ensure that California meets its TE goals;
- TE programs under the final TEF should be funded through distribution rates;
- CCAs should be permitted to access distribution revenue to fund their TE programs and pilots under CCA TEPs.

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[5] *See* Draft TEF at 131.

[6] *See* Attachment 1 for a matrix of existing CCA TE initiatives. *See also* Draft TEF at 132 (describing existing CCA TE programs); *see also Administrative Law Judge Ruling Entering Stocktake Into the Record and Seeking Party Comment*, Attachment B (Stocktake of CCA TE and Electric Vehicle Programs as of May 2019).

II. OPENING COMMENTS

Below, the Joint CCAs respond to the stakeholder questions for Section 10.4.

A. CCAs Should Be Permitted to Serve as Program Administrators for TE Programs and Pilots

1. Should the CPUC consider applications from CCAs for approval to develop their own programs, or administer a portion of the IOUs' authorized TE programs using budgets that are recovered through IOU customer rates?

a. *If yes, what is the appropriate role for the CCAs in accelerating TE (i.e. IOU TE program administrator, designer and administrator of their own programs etc.)?*

The Commission should consider applications from CCAs for development of their own TE programs under the TEF. More specifically, CCAs should be permitted to serve as PAs of their own programs and pilots under their own Commission-approved TEP. In this role, CCAs would be independent of the IOUs in the administration of TE programs and pilots, while coordinating closely with IOU TE programs to prevent duplication of efforts. The Joint CCAs describe their proposed assignment of roles and responsibilities, inherent CCA advantages in administering TE programs, coordination between CCAs and IOUs under the TEF, and proposed cost recovery in more detail below.

1. CCAs Should Be Able to Serve as PAs under Future TEPs Rather than Program Implementers

The Draft TEF suggests that each IOU should work with the CCAs in its service territory "to develop a chapter within its TEP that outlines collaboration to meet the State goals, including alignment on program administration, cost-sharing, and developing distinct, non-competitive TE programs."[7] The Joint CCAs are concerned by what appears to be an implicit premise of this statement, namely, that CCAs would be limited to a "contributor" or program implementer role under the IOU's TEPs. Such an assignment of roles would give the IOU final control in determining the role that each key stakeholder, including CCAs, should play. As further discussed below, the Joint CCAs are concerned that a paradigm that simply "fits CCAs under the IOU's TEP" does not reflect the important role CCAs can, and are already, playing in accelerating TE throughout California. Instead, the Joint CCAs propose that CCAs that wish to

[7] Draft TEF at 134.

administer their own Commission-approved TE programs should be explicitly permitted by the Commission to develop a standalone TEP under the Commission's oversight – one that is independent from the IOUs' TEPs.

The Draft TEF suggests that the Commission should "[c]onsider whether IOUs should hire third party administrators through a competitive bid process for any TE programs, and whether CCAs could bid to be an administrator."[8] The Joint CCAs see this statement as inconsistent with how program *administrator* and program *implementer* roles are typically understood under other ratepayer-funded programs. *Program administrators* are generally responsible for defining the details of program design, as well as overseeing program scope and budget. Importantly, PAs are directly responsible to the Commission, both with respect to program outcomes and the overall composition of programs. Alternatively, *program implementers* are typically chosen by a PA through a solicitation process to run a particular program and/or pilot under the PA's oversight. In this case, while the program implementer has some discretion in program design and management, the PA is ultimately responsible for program outcomes, oversees the program scope and budget, and has the direct relationship with the Commission for program oversight and approval. While program implementers can and do serve an important role, the Joint CCAs request that the final TEF clarify that CCAs may serve as PAs, not merely program implementers. CCAs will be able to make stronger contributions to California's TE goals if they can independently scope their own programs – a task reserved for PAs, not implementers of IOU programs. As described in more detail in section 2 below, CCAs are better positioned than IOUs to identify underserved areas and strategically develop programs that are tailored to local needs.

As PAs of TE programs and pilots, CCAs would have the same rights and responsibilities as the IOUs under the TEF. Specifically, CCAs would file TEPs on the same schedule as the IOUs, outlining their strategic approach for the next 10 years.[9] CCAs would also follow the same rules regarding program and pilot approval as the IOUs. For example, as currently envisioned in the Draft TEF, TE PAs would file applications with the Commission for TE program approval and advice letters for TE pilot approval.[10]

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8 Draft TEF at 135.
9 *See* Draft TEF at 18.
10 *See* Draft TEF at 17.

In summary, the Joint CCAs request that the final TEF be clarified to make sure that, under their respective TEPs, the CCAs would operate independently from the IOUs to develop their own, local TE programs and pilots under the Commission's oversight. Such programs would be administered and implemented by the local CCA themselves or could be bid out to third-parties who would implement components of the programs and pilots with CCA oversight. As discussed in section 2, CCAs have unique abilities that can be best utilized in the context of CCAs serving as PAs. By allowing CCAs to serve as PAs, the Commission will be expanding the scope of its resources to most effectively advance TE goals. While program implementers contribute to these goals, allowing CCAs to serve as PAs will more effectively actuate the unique abilities possessed by CCAs.

2. As Local Government Agencies and LSEs, CCAs Have Unique Abilities That Support and Advance TE

CCAs are uniquely positioned to advance key TE efforts, since CCAs are nonprofit public agency LSEs, which are governed by the cities, counties and towns they serve. As such, CCAs possess local knowledge, data, and expertise that enables them to more effectively accelerate TE deployment in the communities they serve. The following paragraphs describe examples of the inherent advantages held by CCAs in administering TE programs under the TEF. The main point to be made in this regard is that these unique abilities provide a rational basis for the Commission to explicitly permit CCAs to serve as PAs.

First, CCAs are uniquely positioned as public agencies. This manifests itself in two principal ways. As public agencies, CCAs can access unique datasets, which enables them to make strategic, informed decisions and provide tailored solutions that will help California meet its TE goals faster and more equitably. For example, CCAs can access California Department of Motor Vehicle registration data, as well as local parcel and building data. This informs identification of gaps, needs, and opportunities by customer segments. In turn, this local lens allows for strategic investment with a local focus, such as more efficient identification of electric vehicle ("EV") charging infrastructure site hosts to serve a variety of driver use cases. Unlike other policy arenas, the greatest efficiencies in EV charging infrastructure deployment come from having a deep knowledge of local needs, and therefore a hyperlocal focus is necessary to maximize the identification and development of EV charging infrastructure. Additionally, CCAs are governed by boards of local elected officials and engage in a public governance process that

provides transparency, trust, and acceptance. A CCA's connection to city and county partners, many of whom sit on the CCA's board, also enables the CCA to actively accelerate TE adoption by more effectively addressing barriers such as land-use planning and zoning, parking regulations and enforcement, local building ordinances, streamlined permitting and inspections, and public education.

Second, CCAs are uniquely positioned for local stakeholder engagement. By virtue of the fact that CCAs are public agencies, they take a local approach to providing technical assistance and education where it is needed most across each of their customer sectors (public, residential and commercial/industrial). CCAs are also well suited for collaborating with fellow public agencies and community-based organizations ("CBOs"). This is particularly helpful to ensure training programs and job opportunities expand as light, medium and heavy-duty zero-emission vehicle adoption expands. The Draft TEF notes, for example, how "CCA's wide reach and relationship with their customers provide a potentially important avenue that can help accelerate TE adoption."[11] The formation of strategic partnerships by CCAs has already led to the development of new charging infrastructure to meet the needs of multi-unit dwelling ("MUD") residents and commuters – a need that is most acutely recognized at the local level.[12] It also has resulted in technical assistance and financial support to accelerate fleet electrification for local public agency partners, including, but not limited to, school districts, cities, counties, and transit agencies.[13] Engagement on the local level has also facilitated work with industry-leading think tanks and CBOs to create partnerships and to provide technical support to private sector urban delivery and medium- and heavy-duty fleet operators and fleet users to reduce the regional impacts of diesel emissions in vulnerable communities.[14] These are just a few examples of the

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[11] Draft TEF at 132

[12] *See e.g.* PCE's EV Ready Program, information *available at*: https://www.peninsulacleanenergy.com/ev-ready/. MCE's MCEv Charging Program, information *available at:* https://www.mceecleanenergy.org/ev-charging .

[13] For example, Lancaster Choice Energy ("LCE") helped the Antelope Valley Transit Authority become the nation's first fully electric bus fleet by, among other things, providing a special EV rate for electricity supplied by LCE, information *available at:* https://www.lancasterchoiceenergy.com/2019/09/27/lancaster-california-a-choice-location-featured-article-in-business-view-magazine/.

[14] *See e.g.* EBCE's Municipal Fleet Electrification Plans program and Medium- and Heavy-Duty Market Development program, information *available at*: https://ebce.org/drive-electric-business/.

many CCA TE initiatives that are already underway.[15]

Third, CCAs are uniquely positioned with respect to size. The smaller size of CCAs relative to the IOUs allows CCAs to be nimble, quick and flexible in program design and implementation. CCAs can typically develop customer-focused programs quicker than their IOU counterparts and are flexible in adjusting program requirements if the need arises. This can be a great advantage in program development. One example of an innovative program is SCP's demand response program the GridSavvy Community. The GridSavvy Community is built on the premise that customers can be an active solution to help decarbonize communities, and has evolved over the years to include more than 2,900 smart devices such as thermostats, Level 2 EV charging stations, and heat pump water heaters that are capable of responding to grid signals. In addition to typical demand response events that help reduce SCP projected system peaks, Sonoma Clean Power dispatched this "virtual power plant" fleet in August and September to coincide with California Independent System Operator ("CAISO") flex alerts.

Fourth, CCAs are uniquely positioned with respect to TE costs. As non-profit public agencies, CCAs do not collect a rate of return on capital investments and can therefore focus on TE solutions that are strategic and can help avoid costly electrical upgrades whenever possible. Furthermore, CCAs have shown that they are generally able to deploy TE infrastructure at a lower cost than the IOUs. For example, under MCE's MCEv Charging Program,[16] the average cost per installed port is $4,708.[17] As a rough cost comparison, per port costs under PG&E's

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[15] Additional examples of current CCA TE initiatives are described in Attachment 1 ("CCA Transportation Electrification Initiatives: Examples of Existing Programs").

[16] MCEv is similar to Pacific Gas and Electric Company's ("PG&E") Electric Vehicle Charge Network ("EVCN") program, as they both target workplace and MUD properties and provide a rebate for the purchase and installation of electric vehicle supply equipment ("EVSE"). However, MCE offers charging infrastructure for sites that want to install 2 or more ports per site as well, thereby filling a need that was left by PG&E's EVCN program requirement of 10 or more ports per site. The MCEv program has supported the installation of more than 550 Level 2 charging ports, with an additional 450+ ports still planned or under construction. Since the inception of the program, MCE has increased public Level 2 charging capacity by 40% across its service area, meeting one of the original program goals. More information is *available at:* https://www.mcecleanenergy.org/news/press-releases/mce-installs-550-electric-vehicle-charging-ports/.

[17] This cost data is from an MCE internal program report. These numbers represent project costs as of August 31, 2020. These per port costs include hardware, installation (including as needed electric upgrades and parking lot restriping/bollards), and initial contracted networking fees. These project costs are not inclusive of customer or MCE staff time, warranty fees, and permit fees. MCE has kept its per project costs low since 81 percent of its projects completed to-date are 2-6 ports and thus distribution

EVCN program are estimated at approximately $18,000 per port.[18] The demonstrated ability of CCAs to deploy TE solutions in a cost-effective manner will allow any TE program funds allocated to CCAs' TE efforts to go further, and thereby reach more communities in need of EV charging infrastructure.

Fifth, CCAs are uniquely positioned to address market barriers and equity issues. As locally-driven entities, CCAs can serve hard-to-reach, underserved markets in their respective service areas. For example, PG&E has not deployed any EVCN EVSE installations in the entire RCEA service area, as shown in the PG&E EVCN project map.[19] This may be due to the generally high costs associated with deploying projects within the territory, or other incentive structures that ultimately result in this program's failure to serve customers in this region. As a result, RCEA customers pay for the EVCN program without accessing corresponding benefits from this funding. If RCEA were to be allowed to become a PA for TE programs under the TEF, RCEA could develop TE programs and pilots that address local market barriers, thereby increasing equal access to TE programs for all customers.

3. Coordination Between IOUs and CCAs Will Be Necessary to Avoid Duplicative Programs

The Joint CCAs agree with the staff proposal, which recommends that the Commission "[d]irect the IOUs to ensure their TE programs are complementary to, rather than redundant of, CCA TE programs that ***already exist*** in their service territories."[20] However, the Joint CCAs believe that this directive should be expanded so that the IOUs' ***planned*** TE programs also do not overlap with CCAs' ***planned*** TE programs. Specifically, there should be no overlap with programs that CCA PAs commit to developing in their TEPs. To accomplish these directives, it

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level upgrades are rarely needed. Of those 17 projects, only 1 required electrical system upgrades. Also, Americans with Disabilities Act ("ADA") costs are lower with smaller projects since most of MCE's program participants have an additional ADA spot that can be converted to EV accessible spots, whereas larger EV charging projects require more than one EV accessible spot and thus incur those associated costs.

[18] PG&E EV Charge Network Quarterly Report (July 1, 2019 – September 30, 2019), at 13, *available at* https://www.pge.com/pge_global/common/pdfs/solar-and-vehicles/your-options/clean-vehicles/chargingstations/program-participants/PGE-EVCN-Quarterly-Report-Q3-2019.pdf (reflecting PG&E's average cost per port of $17,973 through Q3 2019 in the EVCN program).

[19] EVCN Resources, EVCN Map, PG&;E, *available at* https://www.pge.com/en_US/large-business/solar-and-vehicles/clean-vehicles/ev-charge-network/program-participants/resources.page.

[20] Draft TEF at 135 (emphasis added).

is essential to formally define a coordination process between IOUs and CCAs in the development of the TEPs that clearly outlines each party's roles and responsibilities. As much as is feasible, the Joint CCAs also recommend that IOUs and CCAs should agree upon pre-determined TE programmatic "focus areas" prior to submissions of final TEPs to prevent duplication. Finally, funding should be allocated in a way that ensures that all customers, regardless of which LSE serves them, have equitable access to the benefits of TE programs and pilots. The Joint CCAs elaborate on these concepts in the following sections.

a. CCA-IOU Coordination Process in the Development of the TEPs

The Draft TEF proposes that the IOUs and CCAs should hold roundtable discussions regarding respective roles and responsibilities.[21] Roundtable discussions and coordination are essential, but they must be understood in context. First and foremost, roundtable discussions should not be interpreted as the IOUs holding a more prominent role than CCAs. Hence, the results of the roundtable discussions should not be that the IOUs develop a chapter within their TEP that outlines collaboration with CCAs as proposed in the Draft TEF.[22] Instead, the roundtable discussions should be a forum for formalizing points of understanding about how to integrate the TEPs under development by both IOUs and CCAs. In this regard, these roundtable discussions may be better described as "TE coordination discussions."

The Joint CCAs recommend two principal modifications or clarifications to the roundtable process. First, the Joint CCAs recommend that a third-party be available to facilitate the roundtable discussion, unless all stakeholders agree in advance that a third-party facilitator is not necessary. The Joint CCAs request the option of a third-party facilitator principally because the Joint CCAs believe a third-party facilitator can help ensure that TE coordination discussions are efficient, and that all PAs have a voice in the coordination process. By engaging a third-party, miscommunication, potential biases and competing interests can be more effectively addressed.

Second, the Joint CCAs recommend that the roundtable process be used for long-term planning and coordination. Since CCAs are proposing to submit standalone TEPs, it is necessary to establish a process by which all PAs' TEPs are assessed for meeting the state's overall TE

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21 *See* Draft TEF at 134.

22 *See id.*

goals. To facilitate this assessment, the Joint CCAs envision the following process. As a starting point, both CCAs and IOUs would convene for one (or several) roundtable discussion(s) to discuss a potential delineation of TE "focus areas." (In the next section, the Joint CCAs provide a proposed conceptual framework for delineating CCA and IOU focus areas for future discussion.) These roundtable discussions would occur before either IOUs and CCAs begin drafting their respective TEPs, with the goal of keeping duplication of TE strategies and approaches to a minimum in the development of the TEPs. As a second step, both IOUs and CCAs would then develop draft TEPs. Once the draft TEPs are completed, the parties would then reconvene for roundtable discussions to address areas of overlap or gaps identified among the collection of draft TEPs. Both CCAs and IOUs would then endeavor to address these overlaps and/or gaps, to the extent feasible, in their respective final TEPs. The final TEPs would then be submitted for Commission review and approval as proposed under the TEF.

b. Delineating TE "Focus Areas" Between CCAs and IOUs

The Joint CCAs suggest that, to the extent feasible, IOUs and CCAs should delineate TE programmatic "focus areas" prior to the development of their respective TEPs. The Joint CCAs are confident that gaps or overlap in program coverage can be addressed by clearly defining the universe of core program areas for each PA in advance. While the Joint CCAs acknowledge that it is not an easy endeavor to delineate TE focus areas between IOUs and CCAs, and competing interests may arise in the process, the Joint CCAs are confident that all parties will be able to at least agree on some "principles" or "conceptual delineation" of TE focus areas. In this section, the Joint CCAs make an initial proposal for conceptual delineation. This should be understood as an initial step of CCA and IOU coordination, and the Joint CCAs are open to further discussion and modification of this proposal.

In principle, IOU and CCA roles and responsibilities should be based upon each entity's core functions. The most "natural" distinction between CCA and IOU focus areas is the delineation along geographical boundaries. In other words, the IOUs should be responsible for larger territory-wide and statewide program components, while CCAs would be responsible for regional and local programs. Dividing roles and responsibilities geographically would ensure that the natural strengths for the IOUs and CCAs are appropriately utilized, while also minimizing the possibility for overlapping or redundant programs. As distribution utilities, the IOUs are well positioned to develop and deliver larger "one size fits all" programs across their service areas. As

community-oriented local government agencies, CCAs possess natural strengths that enable them to optimize program offerings in ways that are best for the communities and customers being engaged. This inherent local focus enables CCAs to identify and overcome barriers within their service areas at a local and regional level that may otherwise obstruct widespread TE.

For example, after PG&E launched its EVCN program, MCE learned from many of its customers that they would not be able to participate in the program due to EVCN's 10 ports per site minimum requirement. As a result, MCE created its own, self-funded, Level 2 charging program for workplaces and multi-family properties that offered more tailored services for MCE customers, including a 2-port per site minimum requirement, technical assistance, and an incentive bonus for projects powered by 100% renewable electricity.

In addition to the geographic delineation described above, the Joint CCAs propose that TE programs could be delineated between CCAs and IOUs based upon whether they are "grid infrastructure focused" or "customer and community focused." Under this paradigm, the CCA would be responsible for customer and community focused TE activities, including but not limited to:

- Incentives (e.g., charging infrastructure, vehicles, building electrical upgrades)
- Customer-sited EVSE installation (all customer segments, both customer-owned and CCA-owned infrastructure)
- Deployment of CCA-owned charging infrastructure assets
- Technical assistance to various customer segments (e.g., planning and installation)
- Technical assistance to public agencies (e.g., reach codes implementation and Assembly Bill 1236 compliance)
- Customer and community-based marketing, education and outreach ("ME&O")

The respective IOU, on the other hand, would be responsible for "grid infrastructure focused" activities, including, but not limited to:

- Implementing infrastructure upgrades needed for TE adoption, including grid reliability and hardening
- "Grid-sited" programs
- Streamlining interconnection processes
- Developing uniform building standards

Additionally, the Joint CCAs recognize that there are areas, such as fleets, rate design and vehicle-grid integration ("VGI"), in which both IOUs and CCAs may want to administer programs. The Joint CCAs are confident that the potential for overlapping programs can be addressed through the roundtable process, as described above. The Joint CCAs have included as Attachment 2 to this filing a document that further delineates some of the proposed CCA TE focus areas. The Joint CCAs look forward to discussing these conceptual ideas with the Commission, IOUs and stakeholders through future roundtable discussions or other avenues as determined by the Commission.

c. Ensuring Equitable Access to TE Programs for All Customers

It is important to ensure that ***all*** customers, regardless of which LSE serves them, have equitable access to the benefits afforded by TE programs and pilots offered under the future TEPs. The Joint CCAs suggest that, in certain respects, the Disadvantaged Communities Green-Tariff and Community Solar Green Tariff (collectively, the "DAC Community Solar Programs") provides a helpful model for ensuring that all communities are afforded access irrespective of which LSE administers the program.[23] When the DAC Community Solar Programs were adopted, the Commission explicitly allowed CCAs to serve as PAs for the programs in their respective service areas.[24] More specifically, the Commission chose to reserve program capacity for CCAs according to their proportional share of residential customers who live in DACs. In areas where CCAs do not choose to become PAs for the programs, or in areas where no CCA currently exists, the respective IOU is the default PA for the programs and program capacity reverts back to IOUs.

The Joint CCAs recommend that this "first right of refusal" process should be utilized in TEP coordination as well. For the reasons described above, CCAs should have priority with respect to administering programs that fall within their predefined roles/responsibilities (*e.g.*, local and regional as well as customer- and community-focused programs).

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[23] In June 2018, the CPUC created the DAC Community Solar Programs to increase access to solar for residents of disadvantaged communities located within the IOU's service area. These programs were approved in D.18-06-027. On May 30, 2019, Resolution E-4999 approved, with modification, the tariffs to implement these programs. The Joint CCAs recognize that there are key differences between the DAC Community Solar Programs and TE programs under the proposed TEF, not least of which is the role that administrators play in defining the scope and elements of a TE program. For purposes of this section, the Joint CCAs' reference to the DAC Community Solar Programs is intended to focus on how all communities are afforded access irrespective of which LSE administers the program.

[24] *See* D.18-06-027 at 4, 55-56, 87.

d. Establishing a Funding Cap and Allocating Program Funds Between CCAs and IOUs

Implementing scalable measures to advance TE requires a high degree of cost-effectiveness, both for achieving scale, but also to avoid upward pressure on rates, which could increase on-bill costs of energy, both hurting ratepayers and reducing the benefits of electrification. For these reasons, the Joint CCAs would support establishing an overall maximum on funding available to the portfolio of TE programs and pilots proposed by the PAs. The Joint CCAs would be supportive of the concept of a funding cap, so long as the cap established by the Commission is at the scale necessary to meet established TE goals, and commensurate to the objectives within the approved TEPs. Additionally, in order to ensure equitable program funding between all PAs, the Joint CCAs propose that TEPs include a proposed "portfolio budget" that covers all selected program focus areas. These budget levels would be determined through the TEP coordination process.

B. CCAs Should Be Authorized to Access IOU Revenues to Fund TE Programs

2. If the CPUC allows a CCA to file applications to receive ratepayer funds to administer TE programs, what funds should be used (e.g. IOU distribution revenue, non-by passable charges, etc.)?

This question provides an opportunity to comment broadly on the issue of cost recovery, and specifically on issues involving cost recovery by CCAs, as non-IOU (*i.e.*, non-Commission regulated) entities. As described below, the Joint CCAs' primary concern is not with the precise mechanism through which Commission-approved TE costs are recovered (*e.g.*, IOU distribution revenue, nonbypassable charges, etc.), but rather with ensuring that CCAs have equitable access to these funds and that all customers contribute to the funds. As it stands now, the IOUs' TE programs are funded through revenue derived from distribution rates, paid for by all customers. The Joint CCAs generally find merit in recovering costs through revenue derived from the IOUs' distribution rates. However, the Joint CCAs are not opposed to funding TE programs through other rate elements. From the Joint CCAs' perspective, the primary issue to be addressed is not which rate element should be used to fund CCA programs, but rather how should the current inequitable cost-allocation structure be remedied.

As a foundational matter, inequity currently exists with respect to which customers contribute to TE programs. On the one hand, costs of the IOUs' TE programs are recovered

through the IOUs' distribution rates, which are paid by ***all*** customers (both bundled and CCA customers alike). On the other hand, CCAs have funded their TE programs using revenue collected through their generation rates, which are ***only paid by*** CCA customers. As a result, CCA customers are currently paying CCA generation rates to support CCA TE programs, while also paying IOU distribution rates to support IOU TE programs. This cost inequity has been acknowledged by the Commission.[25] The Joint CCAs have been willing to use funds from their generation rates to offer TE programs because their programs are responsive to local needs and are consistent with the CCAs' missions. However, the ability to do so is not limitless and must be balanced by the need to maintain competitive generation rates. Therefore, the Joint CCAs greatly appreciate that the Commission is now considering ways to address this cost inequity.

If the Commission allows CCAs to file applications to administer TE programs, as supported above, the current inequitable cost allocation structure must be corrected. As further described below, models exist through Commission orders for forms of funding that, if applied to TE program costs, would correct this inequity – funding that ensures Commission oversight, collaboration with the IOUs, equitable treatment for contributions made by CCAs, and payment of costs by all customers. Under these forms of funding, since CCAs would be offering programs approved by the Commission and under the Commission's oversight, CCAs should be permitted to fund their TE efforts in the same manner and on the same scale as the IOUs.

Below, the Joint CCAs provide additional comments on issues broadly related to cost recovery by CCAs.

1. The Commission Can and Should Utilize Its Broad Ratemaking Authority to Grant CCAs Access to IOU Revenues

The following section serves two interrelated purposes. First, the comments address an issue identified in the Draft TEF about the relevance of CCAs not being explicitly identified in

[25] *See* R.18-12-006, *Order Instituting Rulemaking to Continue the Development of Rates and Infrastructure for Vehicle Electrification*, at 12 ("[C]urrently approved TE programs are largely recovered through the distribution rates of all utility customers, regardless of which customers can participate in the programs and how much of the customer-side infrastructure may be owned and operated by the utilities. As more customers choose to take service from providers other than the incumbent utility (e.g., as customers of Community Choice Aggregators), the Commission should consider how to equitably allocate costs and benefits of clean transportation programs funded by ratepayers."). *See also* Draft TEF at 132 ("A significant difference between the CCA and IOU TE programs is the method for how the programs are funded. IOU program costs have largely been recovered through distribution rates. CCAs TE programs, on the other hand, are typically funded through their generation revenue. . .").

the underlying TE statute. Comments on this issue could have been included in the sections above. However, the Joint CCAs place these comments in this section because it appears that the principal concern being expressed is how, absent statutory directive, a non-IOU entity can receive funds derived from an IOU's rates.

Second, the comments in this section describe how the Commission has broad ratemaking authority that has been used in the past to allow access by non-IOU entities to funds derived from IOU rates. Similar to the first purpose, the determining factor in these previous Commission determinations has not been the identification of the non-IOU entity in statute, but whether the non-IOU entity's access to funds will serve a Commission-established goal.

a. Relevance of Explicit Statutory Identification

The Draft TEF states that "[w]hile California statute authorizes a role for CCAs in the administration of energy efficiency programs, it does not authorize a similar CCA administrator role for TE programs."[26] While factually correct, this fact should not be read in isolation and, more importantly, should not prevent either CCA administration of TE programs or CCA cost recovery for Commission-approved programs. The Commission has broad ratemaking authority and, absent explicit directives to the contrary from the Legislature, the Commission is not statutorily restricted in its ability to authorize and allow cost recovery by non-IOU entities for programs that are overseen by the Commission.

Given the Commission's broad authority and its comprehensive oversight of energy-related programs, the courts have liberally construed the Commission's authority. In this regard, the Commission's actions will generally be upheld as long as they are "cognate and germane" to the Commission's regulatory scope and do not violate a specific statutory limit imposed by the Legislature.[27] The Commission has used this broad ratemaking authority multiple times with respect to energy programs administered by non-IOU entities. The Commission has made these determinations after careful consideration of facts and policy as part of the record in a proceeding, allowing for input from stakeholders.

Above, the Joint CCAs have identified various policy and practical reasons why CCAs should be allowed to administer TE programs that are overseen by the Commission. For these reasons, the Joint CCAs believe the Commission should again utilize its broad ratemaking

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[26] Draft TEF at 133. *See also* California Public Utilities Code Section 381.1.

[27] *See, e.g.,* Decision ("D.")10-12-060 at 5.

authority to grant CCAs access to revenue derived from IOU rates. In doing so, the Commission can rely on similar determinations made in other proceedings, as described below.

b. Similar Determinations Made by the Commission

Below, the Joint CCAs provide examples of energy programs for which the Commission has allowed participation by non-IOUs even though the underlying statute explicitly identified the IOUs. These examples are relevant because the underlying TE statute directs the Commission to ***require*** the IOUs to file TE applications, but is silent with respect to whether the Commission may also ***allow*** CCAs to file TE applications.[28] The examples below reflect the rule described in the previous section, namely, absent express limitations imposed by the Legislature, the Commission can, based on facts and policy considerations developed in the regulatory proceeding, allow non-IOU entities to administer energy programs.

The following is a summary of these examples:

- Public Utilities Code Section 381 authorizes the Public Purpose Program Charge ("PPPC"), which provides funding for numerous energy programs. Although the "electrical corporations" are specifically identified in Section 381, the Commission has repeatedly determined that non-IOUs may administer or participate in programs supported by the PPPC. Of particular note, the Commission determined that local government entities (Regional Energy Networks ("RENs")) may administer energy efficiency ("EE") programs funded by the PPPC.[29]

- Section 2827.1 (added by Assembly Bill 327 [2013]) specifically involves disadvantaged communities ("DAC") tariff programs applicable to the large IOUs, yet the Commission expanded involvement to non-IOUs (CCAs) upon adherence to the Commission's rules.[30]

- Section 399.15 (originally added by AB 970 [2000], later renumbered Section 379.5) authorized funding for the Self Generation Incentive Program ("SGIP") and specifically directed the Commission to allow the IOUs to take action and seek recovery of SGIP program costs. The Commission determined, however, in D.01-03-073 that the San Diego Regional Energy Office ("SDREO") (a nonprofit that has since changed its name to the Center for Sustainable Energy ("CSE")) should administer the SGIP in San Diego Gas & Electric Company's ("SDG&E") service territory.

- Senate Bill 1 (2006) codified the Commission's California Solar Initiative ("CSI"), established by the Commission in D.06-01-024. In D.06-01-024, the Commission authorized a non-IOU administrator (SDREO/CSE) to implement the CSI in SDG&E's

[28] *See* Pub. Util. Code § 740.12(b).
[29] *See* D.12-05-015 and D.19-12-021.
[30] *See* D.18-06-027 at 87.

service area. The Commission cited the "extensive experience" of SDREO in administering the SGIP in the San Diego region, and other factors.[31]

- AB 2723 (2006) codified the low-income set-aside in the CSI, and established the Multifamily Affordable Solar Housing ("MASH") and Single-Family Affordable Solar Homes ("SASH") programs. Notwithstanding references to the IOUs in the CSI and the legislative digest for AB 2723, MASH and SASH programs are administered by non-IOU entities: CSE and GRID Alternatives.

The examples described above share the same general characteristics: (1) the IOUs are identified in the underlying statute, and non-IOU entities are not; (2) the Commission determined, based on facts and policy considerations in the record, that the energy program would be enhanced by non-IOU entity participation; (3) the non-IOU entity voluntarily submitted to Commission oversight and adherence to Commission-established rules; and (4) the non-IOU entity received cost recovery from funds derived from IOU rates. These characteristics are also present in the current context, and lead to a conclusion that the Commission may authorize funding for CCA-involvement in Commission-authorized TE programs.

2. Allowing CCAs to Access IOU Revenue Is An Equitable Solution

As noted above, the Commission has recognized the inequity with the current cost recovery approach.[32] This is particularly problematic when IOUs' and CCAs' programs overlap, and a CCA customer pays for multiple programs aimed at achieving similar results. By allowing CCAs to pursue cost recovery from revenue derived from the IOUs' distribution rates, which are paid by all customers, the Commission will address this problem. As a result, CCA customers will no longer pay more for similar TE programs, since the Commission's processes will ensure that TE programs are not duplicative and that all customers pay for Commission-approved TE programs.

3. The Commission Has Previously Permitted Non-IOUs Access to IOU Revenue to Administer Energy Programs

As noted above, various examples exist of non-IOU administration of energy programs that are recovered through funds derived from IOU rates. As described in more detail below, there is a common theme among these programs that justifies cost recovery by the non-IOU, namely, the non-IOU entity's experience and influence within the program space will positively

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31 *See* D.06-01-024 at 39, 42.

32 *See* note 25, above.

contribute to the overall program. The Joint CCAs believe that a similar justification exists for cost recovery by CCAs in the context of Commission-approved TE programs.

As has been previously stated, the following examples reflect the general rule described above, namely, absent express limitations imposed by the Legislature, the Commission can, based on facts and policy considerations developed in the regulatory proceeding, allow non-IOU entities to administer energy programs. Accordingly, if the Commission determines in this proceeding, based on facts and policy considerations, that CCA involvement in the TE program is beneficial and will positively contribute to the Commission's TE program, then the Commission may allow CCA participation and authorize resulting cost recovery.

a. CSE Administration of SGIP

In D.01-03-073, the Commission adopted the ratepayer-funded SGIP in response to AB 970, which called for more distributed generation and load control.[33] AB 970 provided that the Commission shall "include the reasonable costs involved [in such initiatives]. . . in the distribution revenue requirements of utilities regulated by the commission, as appropriate."[34] While referencing IOUs, AB 970 did not specify the entities that would be PAs in these areas. In D.01-03-073, the Commission decided, pursuant to its own regulatory authority, that the SDREO - a nonprofit that has since changed its name to the CSE - would administer SGIP, via contractual arrangement, for SDG&E's service territory.[35] This grant of authority came in response to party comments that the Commission find entities other than utilities "whose interest[s] [are] more aligned with program success" to administer the SGIP.[36] The Commission noted that the proposal to designate SDREO as a PA "provides us with an opportunity to explore non-utility administration on a limited basis. We believe that such exploration will be valuable, given the concerns raised by parties regarding utility administration in this proceeding."[37] CSE

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33 R.98-07-037, D.01-03-073, at 6.

34 AB 970, Section 7 (adding Cal. Pub. Util. Code § 399.15). Note that Cal. Pub. Util. Code § 399.15 is now codified as Cal. Pub. Util. Code § 379.5. While initially the SGIP was funded through distribution revenue, the Commission approved SDG&E's request to begin funding CSE's share of the program using the PPPC instead of distribution funds in 2017. Thus, CSE's funding source for SGIP is currently PPPC funds. Nevertheless, CSE's administration of the SGIP from program inception through 2017 provides one example where the Commission has in the past permitted a non-IOU third-party to utilize IOU distribution revenues in the administration of a program.

35 D.01-03-073 at 5.

36 *Id.* at 17-18.

37 *Id.* at 18.

continues to be the PA for SGIP in SDG&E's service territory, and is generally regarded as a highly successful PA for this program. In addition to SGIP, CSE also is the PA for CSI.

b. CSE Administration of CSI

Similarly, administration of the ratepayer funded CSI programs by CSE also arose by the Commission's own suggestion in Rulemaking ("R.") 04-03-017. SB 1, which later established the CSI via statute, did not give SDREO or any non-utility entity the authority to administer CSI.[38] SB 1 also did not address or disturb the Commission's determination to authorize non-utility administration of CSI.[39] Still, in D.06-01-024, the decision establishing the CSI, the Commission cited the "extensive experience" of SDREO in administering the SGIP in the San Diego region, and determined that it is "prudent to continue the status quo with existing program administrators, including SDREO."[40] As with the SGIP, the CSI program was initially funded from distribution revenues, including for CSE's administration of the CSI.[41]

c. Regional Energy Networks Involvement in Energy Efficiency Programs

The Commission's previous consideration of RENs has relevance for the Commission's consideration of CCA involvement in TE programs insofar as it reflects another example of a non-IOU entity being allowed to administer a Commission-overseen energy program. RENs are also relevant because they are local government entities, like CCAs, and share many of the characteristics described above that position local government entities to administer local and regional energy programs. The Commission originally introduced the concept of RENs in D.12-05-015.[42] At the time, local government partnerships ("LGPs") were in existence, but the Commission was exploring ways to involve local governments more directly in administering EE programs.

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[38] SB 1 (2006) established the CSI via statute. It acknowledged that the Commission adopted the CSI in D.06-01-024, but noted that nothing in the statute should be construed to codify the decision. *See* SB 1, Section 1(a), (b). SB 1 did not address third party administration of CSI.

[39] SB 1 (Murray, 2006) established the CSI via statute. It acknowledged that the Commission adopted the CSI in D.06-01-024, but noted that nothing in the statute should be construed to codify the decision. *See* SB 1, Section 1(a), (b).

[40] D.06-01-024 at 14, 42, 36.

[41] D.06-01-024, pp. 5, 18, Ordering Paragraph 4. *See also* D.06-12-033, Conclusion of Law 28. As with SGIP, the Commission authorized SDG&E to begin recovering CSI funds via the PPPC in 2017 in D.17-08-030, OP 2

[42] *See* D. 19-12-021 at 3.

In response to several parties' comments in favor of expanding local government EE programs, the Commission invited proposals from local government entities to form RENs.[43] The Commission was receptive to program administration by RENs in light of parties' comments that RENs would be able to effectively "[p]rovide missing technical resources that will get more projects implemented[,]" include more public agencies in implementation, leverage LGPs, provide centralized regional program management, and tailor programs to local needs and priorities.[44] The Commission noted that local governments' growing experience in EE (through implementation of utility programs or their independent efforts), as well as their access to additional funding from state and federal sources, made them increasingly well positioned to be PAs.[45] The Commission therefore allowed participation by RENs.[46]

At the time of the approval of the first RENs, many local governments had experience administering EE programs directly because of access to grants and other funding from the American Recovery and Reinvestment Act ("ARRA") of 2009.[47] D.12-11-015 sought to capitalize on that experience by continuing successful approaches that were deemed appropriate to be continued. This decision therefore reiterated that increasing local capacity - both in terms of funding and expertise - coupled with local governments' vocalization of their frustration with utility approaches, led the Commission to recognize the value of program administration by local government entities. Just last year, in D. 19-12-021, the Commission authorized the continued operation of existing RENs and invited new REN proposals as business plans to be filed with the Commission.

d. CCA Involvement in DAC Community Solar Programs

AB 327 required the Commission to develop specific alternatives designed to increase adoption of renewable generation in DACs. In D.18-06-027, the Commission adopted three programs to promote solar distributed generation in DACs.[48] Here, the Commission was presented with a request that CCAs become PAs of DAC Community Solar Programs for their own customers and also be eligible for cost recovery. In response, the Commission agreed "with

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43 *See id.* at 146-51.
44 *See* D. 19-12-021 at 146.
45 *See id.*at 147-48.
46 *See id.* at 148-49.
47 *See id.* at 4.
48 The DAC Single-Family Affordable Homes and DAC Community Solar Programs.

CCA parties that the Community Solar Green Tariff program [and DAC-Green Tariff program] should be available to both bundled and unbundled customers."[49] The Commission reasoned "[t]his is both because both groups of customers pay for the program, and (more to the point) because the potential benefits of the program should not be limited based upon the retail energy choice of customers."[50] As a result, the Commission revised the proposed decision to "address this potential inequity" between IOUs and CCAs, and expressly authorized CCAs to administer their own DAC Community Solar Programs and to receive access to program funding to do so.[51] The Commission also addressed the practical challenges of allowing CCAs the option to offer mandated programs under a universal cost-recovery approach. To ensure program alignment and provide Commission oversight with respect to CCA programs, D.18-06-027 established a Tier 3 advice letter process to ensure that CCA programs abide by all "rules and requirements adopted by [the] decision."[52] Both Clean Power Alliance and MCE have submitted advice letters to the Commission to implement DAC Community Solar Programs.[53] Other CCAs are expected to submit similar advice letters.

e. CCAs Serve as Administrators for EE Programs

In D.14-01-033, the Commission revised its interpretation of the term "administrator" for EE programs to include CCAs, concluding that it is appropriate for CCAs to be EE PAs in the same sense that IOUs are EE PAs.[54] To date, three CCAs have been authorized by the Commission to serve as PAs for EE programs.[55]

CCAs that wish to serve as PAs for EE programs have two options. The first option permits CCAs to submit an advice letter to administer EE programs *just* for the CCA's own customers, using funds that are *only* collected from the CCA's customers. This is generally

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49 D.18-06-027 at 63.

50 *Id.* at 87.

51 *See id.* at 90 ("To address this potential inequity between investor-owned utilities and CCAs and consistent with the change to the program's funding source, the revised APD has been revised to allow CCAs to create DAC-Green Tariff programs funded by GHG allowance revenues.").

52 *See* D.18-06-027 at 104; Ordering Paragraph 17. The details of this process were further described by the Commission in Resolution E-4999 at 12-19.

53 *See* Advice Letter CPA 0004-E (December 27, 2019) and Marin Clean Energy Advice Letter MCE 42-E (May 7, 2020).

54 *See* D. 14-01-033 at 47.

55 MCE has been serving as a PA for ratepayer-funded EE programs since 2013. LCE received approval in 2018 via Resolution E-4917. RCEA received approval in 2020 via Resolution E-5050.

referred to as the "elect to administer" option.[56] Alternatively, a CCA can submit a formal application to the Commission to administer cost-effective EE and conservation programs that are open to *all* customers, including bundled customers. This is generally referred to as the "apply to administer" option.[57] The latter option permits CCAs to access funds earmarked for EE programs from both their customers as well as bundled customers, since the programs are open to all customers.

4. An Analysis of the Commission's Past Determinations on non-IOU Cost Recovery, Coupled with Determinations Made in this Proceeding, Warrant a Conclusion That CCA Cost Recovery Is Justified

The examples described above provide a framework to analyze the Joint CCAs' request for the recovery of costs for CCAs' TE programs. The orders approving these examples reflect the general rule described above, namely, absent express limitations imposed by the Legislature, the Commission can, based on facts and policy considerations developed in this proceeding, allow CCAs to administer TE programs and seek cost recovery under the Commission's oversight.

First, in the context of TE programs, the Legislature has not specified any limitations on whether the Commission may allow CCAs to administer programs and seek cost recovery. While the Commission has a statutory obligation to direct the IOUs to file TE applications, the Legislature has not limited the Commission's ability to authorize other entities to file TE applications. As reflected in the examples described above, if "cognate and germane" to the overall TE program, the Commission may use its broad authority to invite and allow CCAs to also file TE applications, even though CCAs are not explicitly named in the statute.

Second, like the examples described above, CCAs possess skills and abilities that can contribute to the overall success of TE programs. For example, as described above in the context of the SGIP program, the Commission found that a non-IOU administrator had interests more aligned with "program success" and that inclusion of the non-IOU entity would provide a valuable opportunity to explore non-IOU administration.[58] Likewise, the Commission found, in

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[56] *See* D. 14-01-033 at 2. LCE and RCEA have both utilized this alternative "elect to administer" option through a Tier 3 Advice Letter.

[57] *See* Public Utilities Code Section 381.1(a)-(d). MCE is the only CCA utilizing this EE option as of 2020.

[58] *See* notes 36-37, above.

the context of RENs, that the use of local government entities would provide missing technical resources, leverage LGPs and otherwise aide overall EE efforts. Both of these findings are equally applicable in the context of CCA involvement of TE programs, as reflected in the record for this proceeding.

Third, the examples described above reflect the fact that the absence of statutory inclusion does not hinder the Commission from regulating entities that otherwise are not under the Commission's oversight. In this regard, D.16-10-039 is instructive. In D.16-10-039, the Commission restated its earlier determination that the Commission "does not need rate jurisdiction" over non-traditional entities "to regulate their voluntary participation in" a Commission-administered program.[59] In explaining its earlier determination, the Commission stated that "[b]ecause participation would be voluntary, the Commission concluded that it is not exercising jurisdiction over these non-traditional carriers, but rather, is operating pursuant to the Public Utilities Code to administer the Program."[60] The Commission's holding also had a practical basis, which is equally applicable with respect to CCAs in the context of the TE program, namely "we do not mandate, but rather, encourage … service providers to participate in the [Commission's] Program on a voluntary basis. *** Having seen significant success in the voluntary participation of [other non-traditional entities], we are providing [an] opportunity to participate in the Program on a voluntary basis as well."[61]

In summary, the Commission — in the absence of specific statutory mandates — has authorized CSE to administer the SGIP and the CSI, as well as RENs to administer EE programs. In doing so, the Commission has taken the initiative to recognize that nonprofits and public agencies have the subject-matter expertise and localized experience to administer various ratepayer-funded programs. Since the Commission has been willing to broaden its definition of a PA to entities other than IOUs in other program areas - without an explicit statutory mandate, but in response to party feedback – the Joint CCAs believe that the Commission should similarly exercise its broad authority and do so in the context of TE programs. As California aggressively moves forward with TE efforts, it will be important for the Commission to harness the proven

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59 *See* D.16-10-039 at 10 (referencing D.13-05-035 at 15-16).

60 D.16-10-039 at 10 (referencing D.10-11-033 at 135; Conclusion of Law 29.)

61 D.16-10-039 at 11 (emphasis added).

interest and efficacy of public agencies like the Joint CCAs. Allowing cost recovery for CCAs is one key way to support the Commission's overall TE efforts.

III. CONCLUSION

The Joint CCAs thank Assigned Commissioner Rechtschaffen and Administrative Law Judges Doherty and Goldberg for their consideration of the matters discussed herein. The Joint CCAs look forward to continuing to participate in this proceeding in order to ensure that CCA programs are enabled to serve as effective partners in the TE space moving forward.

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Respectfully submitted,

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ATTACHMENT 1

CCA Transportation Electrification Initiatives: Examples of Existing Programs

Access to Charging	Incentives and Total Cost of Ownership	Market Education, Coordination & Technical Assistance
100% Renewable Energy for customers, including charging network providers; products approved by CARB, on Zero-CI Lookup Table (EBCE, MCE, SCP)	Used EV Rebates for Low-income Customers (PCE)	Reach Codes (PCE, SVCE, EBCE)
Facilitating CALeVIP Projects with CEC (SCP, MBCP, PCE, SVCE, San Jose; EBCE -2021)	EV Rebates for Low-income Customers (MCE)	Municipal Fleet Electrification Plans (EV, EVSE & other DERs) (EBCE, PCE, SCP)
Deploying Streetlight-mounted Level 2 EV Charging Stations (EBCE)	EV Purchase Discounts (PCE, SCP, San Jose, MCE)	Charging Infrastructure Planning and Deployment TA to multiple customer segments (PCE, SVCE, MCE, EBCE)
Brownfield Reuse for EV Common Charging Yards (MD) and Hubs (LD) (EBCE)	EV Charging Infrastructure Technical Assistance and Rebates for Multi-unit Dwellings and Workplaces (non-CALeVIP; MCE, CPA)	Medium- and Heavy-Duty Market Development (EBCE)
Coordination with Port of Oakland on Common Charging Yards for HD fleets (on Port property; EBCE)	Priority Zone DC Fast Charger Incentives (SVCE, EBCE)	AB 1236: Streamlined EV Charging Infrastructure Permitting (EBCE, MCE)
Coordination with care share provider to increase access to zero emission options at affordable housing properties (EBCE)	E-bike Incentives (PCE, SCP, RCEA)	School Bus Fleet Electrification Analysis (SCP)
	Smart Charging Pilot (PCE)	Regional Recognition/Case Study Promotion (SVCE)
	Demand Response Programs (SCP, CPA)	Innovation Onramp (SVCE)
		TE Clearinghouse (SVCE)
		Member of Joint Agency VGI Working Group (EBCE, PCE)

**Note: This list represents a sample set of programs only. It is not intended to be comprehensive, as it does not reflect all programs currently offered by every CCA.*

CCA Transportation Electrification Initiatives: Examples of Existing Programs (Detail)

CCA	Program Name	Description
Clean Power Alliance (CPA)	Power Response	Enables commercial customers with electric vehicles chargers and energy storage systems to reduce energy costs by modifying usage during times of peak energy use.
East Bay Community Energy (EBCE)	Municipal Fleet Electrification Plans	Roadmaps for local government partners to implement fleet EV, EVSE and other DERs in next 10 years.
	Medium- and Heavy-Duty Market Development	Assessing DMV registration data for service area to understand ecosystem of M/HD fleets; will provide technical assistance to target fleets; coordination with Port of Oakland on charging infrastructure on and off Port property: goal is to establish EBCE's service area as a first-mover market for M/HD goods movement electrification.
	Brownfield Reuse for EV Charging Hubs	Grant award from USEPA (1 of 4 nationally) to assess Brownfields as potential opportunities to deploy shared charging hubs and common charging yards for two use cases (MD fleets and LD drivers).
	2021 Alameda County CALeVIP	Pending incentives for installation of shared L2 and DCFC EVSE; EBCE sole co-funding partner ($15M commitment).
	Reach Codes	Support member agencies in developing and adopting EV Ready reach codes.
	Renewable Energy for Charging Network Providers	Collaboration with charging network providers and other site hosts to serve 100% renewable energy at charging stations. EBCE became the first load serving entity in the state to receive approval from CARB to register its 100% renewable energy product as a certified pathway in the LCFS program.
	AB 1236: Streamlined EVSE Permitting	Provided technical assistance to member agencies and coordinated with Go-BIZ.
	Deploying Streetlight-mounted EV Charging Stations	Collaborating with municipal partner to deploy EBCE-owned Level 2 EV chargers on City owned streetlight poles, leveraging existing electrical capacity and infrastructure for curbside charging.
	Public EV Charging at Faith-based Organizations	Partnering with CBO to collaborate with their members (local congregations) on the development of a plan to deploy publicly accessible EV charging stations at congregations throughout the county.

CCA Transportation Electrification Initiatives: Examples of Existing Programs (Detail)

CCA	Program Name	Description
MCE (formerly Marin Clean Energy)	MCEv Vehicle Rebate	EV rebate for residents with lower incomes.
	MCEv Charging	Technical assistance & rebate for EVSE @ workplaces & MUDs.
	MCEv Car Sharing	Stackable service with MCEv Charging program to add a shared EV on-site; incentives for low-income MUDs & tenants.
	Zero CI LCFS certified power for Commercial Customers	MCE became the second load serving entity in the state to receive approval from CARB to register its 100% renewable energy product as a certified pathway in the LCFS program.
	AB 1236: Streamlined EVSE Permitting	Provided technical assistance and coordination with member agencies and Go-BIZ.
	Drive Deep Green	Dedicated marketing effort to help EV drivers opt up to 100% renewable power & switch to the EV rate.
	Drive Clean Bay Area	Co-funder of a community-based non-profit initiative to increase EV adoption using behavioral marketing, collective EV purchasing to reduce upfront costs, and concierge support from buying to driving EVs.
Peninsula Clean Energy (PCE)	Drive Forward Electric	Used EV rebate for residents with lower incomes.
	EV Ready	EV charging station incentive and technical assistance to install 3,500 charge ports.
	Smart Charging Pilot	Residential managed charging, utilizing vehicle telematics. This VGI pilot is in support of PCE's goal of providing 100% renewable energy on a time-coincident basis by 2025 by shifting charging demand off-peak. The pilot is utilizing vehicle telematics as a non-hardware based solution.
	Reach codes	Model reach codes and coordination with local cities to promote EV readiness and building electrification in new construction.
	Community pilots	PCE provided six grants to fund innovative local projects that reduce GHG emissions and benefit the community, including a green fleets pilot with the County of San Mateo.

CCA Transportation Electrification Initiatives: Examples of Existing Programs (Detail)

CCA	Program Name	Description
Silicon Valley Clean Energy (SVCE)	FutureFit Assist: EV Charging	Technical assistance for installing EV charging stations at MUDs and small/medium businesses
	Reach Codes	Support member agencies in developing and adopting EV reach codes
	Priority Zone DCFC	Additional incentives (stacking on CALeVIP) for DC Fast Chargers near certain MUD-dense "Priority Zones"
	SVTEC	Silicon Valley Transportation Electrification Clearinghouse - a collaboration of local stakeholders
	Regional Recognition	Discover and share best practices for installing EV charging
	Innovation Onramp	Semi-annual application cycle to support innovative projects in our communities
Sonoma Clean Power (SCP)	Grid Savvy	Demand Response Program using residential EVSE. SCP is able to dispatch participating EVSE to reduce peak load
	Transit Fleet Electrification	Fleet electrification analysis of the 4 transit fleets operating in SCP territory
	School Bus Electrification	Fleet electrification analysis of the two largest school bus fleets in Sonoma and Mendocino Counties
	DriveEV	Over three years (2016-2018) SCP provided incentives up to $3000 on the purchase of EV's. 1260 EVs were incentivized
	E-Bike Incentive	SCP is planning to provide incentives for up to 1,000 E-bikes beginning in Nov. 2020
City of San José (San José Clean Energy)	CALeVIP	EV Charging station incentives for Level 2 and DC Fast Charging ($14 million)
	Drive Electric San José	Discounts on EVs at 5 participating San José dealerships
	Drive Electric San José Financial Assistance	Educational workshops on EV's and financial empowerment as well as one-on-one financial counseling for low to moderate-income residents

Note: This list represents a sample set of programs only. It is not intended to be comprehensive, as it does not reflect all programs currently offered by every CCA.

ATTACHMENT 2

Proposed CCA Transportation Electrification Program Focus Areas

Access to Charging*	Incentives and Total Cost of Ownership (TCO)	Market Education (ME), Coordination & Technical Assistance (TA)
Home Charging Level 1 and 2 (L1 and L2) charging for single family homes and multi-unit dwellings (MUD) – market rate & affordable **Workplace Charging** L2 charging for workplaces **Public Charging** Local, data-driven siting of publicly accessible L1, L2, and Direct Current Fast Charge (DCFC) hubs **Fleet Charging** L1, L2, and DCFC charging for public and private sector fleets, including light, medium, and heavy-duty vehicles ** Level 2 and DC fast charging programs will include both LSE and third party owned chargers.* ***Access to charging supported through customer EVSE and electric panel upgrade incentives, LSE-owned investments*	**Rate Design, Price Signals, Customer Bill Management & Load Balancing** ● Rate design to encourage EV adoption ● Customer enrollment in 100% renewable energy products to optimize GHG reduction and LCFS credits ● Balancing renewables and ramping with residential, DCFC, and L2 workplace charging **VGI (V1G / V2G)** ● Send DER marketplace signals to qualified vendors participating in VGI pilots/programs ● V1G/V2G incentives for managed charging or flexible demand; vehicle to building or local power grid (RES & COMM) ● Increase resilience of light-duty, school, and transit fleets; pilot V2G projects ● Resilience incentives for customers w/onsite Distributed Energy Resources **Vehicle Incentives** ● Low-income customers ● Rideshare drivers ● Group purchase discounts ● e-bikes **Financing**	**Market Education** ● Community outreach campaigns ● Rates-focused outreach campaigns ● Targeted outreach to low-income customers and fleets in Disadvantaged Communities (DACs) and Low-income Communities (LICs) **MUD TA** Charging infrastructure planning and deployment in affordable MUDs **Fleet TA** EV, charging infrastructure and resilience planning and deployment, including TCO analysis, for public and private sector fleets (light, MD/HD vehicles w/focus on those domiciled and operating in DACs/LICs) **Public Agency TA** ● AB 1236 charging infrastructure permit streamlining ● Reach Code development for EV Readiness and VGI optimization for new and existing buildings ● Coordination on Air Quality Risk Reduction & Climate Action Plans